

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	
)	
V.)	CIVIL ACTION NO. SA-21-CV-682
)	
\$530,458.44, MORE OR LESS IN)	
UNITED STATES CURRENCY,)	
)	
Respondent.)	

VERIFIED COMPLAINT FOR FORFEITURE

Comes now Petitioner United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, pursuant to Rule G, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Federal Rules Civil Procedure, and respectfully states as follows:

**I.
NATURE OF THIS ACTION**

This action is brought by the United States of America seeking forfeiture to the United States of the following property:

\$530,458.44, MORE OR LESS IN UNITED STATES CURRENCY,

hereinafter referred to as the "Respondent Currency."

**II.
JURISDICTION AND VENUE**

Under Title 28 U.S.C. § 1345, this Court has jurisdiction over an action commenced by the United States, and under Title 28 U.S.C. § 1355(a), jurisdiction over an action for forfeiture. This Court has *in rem* jurisdiction over the Respondent Currency under Title 28 U.S.C. §§ 1355(b)(6) and 1395. Venue is proper in this district pursuant to Title 28 U.S.C. § 1355(b)(1)(A) because

the acts or omissions giving rise to the forfeiture occurred in this district, and pursuant to Title 28 U.S.C. §§ 1355(b)(1)(B) and 1395(b) because the Respondent Currency is found in this district.

The Respondent Currency was seized on February 25, 2021, by the United States Secret Service (USSS) and has remained in the custody of the USSS within the jurisdiction of the United States District Court, Western District of Texas, San Antonio Division, and shall remain within the jurisdiction of the Court pending litigation of this case.

III.

STATUTORY BASIS FOR FORFEITURE

This is a civil forfeiture action *in rem* brought against the Respondent Currency for violations of Title 18 U.S.C. § 1343, and subject to forfeiture to the United States of America pursuant to Title 18 U.S.C. § 981(a)(1)(C), which states:

Title 18 U.S.C. § 981. Civil forfeiture

(a)(1) The following property is subject to forfeiture to the United States:

* * *

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of section . . . or any offense constituting "specified unlawful activity" (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

Wire Fraud offenses are offenses constituting "specified unlawful activity" as defined in Title 18 U.S.C. § 1956(c)(7).

IV.

FACTS IN SUPPORT OF VIOLATIONS

See Appendix "A" for facts under seal.

V.

PRAYER

WHEREFORE, Petitioner, United States of America, prays that due process issue to enforce the forfeiture of the Respondent Currency, that due notice pursuant to Rule G(4) be given

to all interested parties to appear and show cause why forfeiture should not be decreed,¹ and in accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., that the Respondent Currency be forfeited to the United States of America, that the Respondent Currency be disposed of in accordance with the law and for any such further relief as this Honorable Court deems just and proper.

Respectfully submitted,

ASHLEY C. HOFF
United States Attorney

By:



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Attorneys for the United States of America

¹ This Complaint will be sent to those known to the United States to have an interest in the Respondent Currency.

VERIFICATION

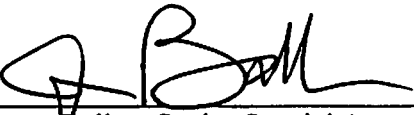
Senior Special Agent Jason Bollen declares and says that:

1. I am a Senior Special Agent with the United States Secret Service, assigned to the San Antonio Field Office, and am the investigator responsible for the accuracy of the information provided in this litigation; and

2. I have read the above Verified Complaint for Forfeiture and know the contents thereof; that the information contained in the Verified Complaint for Forfeiture has been furnished by official government sources; and based on information and belief, the allegations contained in the Verified Complaint for Forfeiture are true.

Pursuant to Title 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 19 day of July, 2021.



Jason Bollen, Senior Special Agent
United States Secret Service
San Antonio Field Office